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January 27, 2014

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation; WC Docket Nos. 11-42, 03-109

Dear Ms. Dortch:

On Thursday, January 23, 2014, John Heitmann and Joshua Guyan of Kelley Drye & Warren LLP, on behalf of five members of the Lifeline Connects Coalition (“Coalition”),¹ participated in a telephone call with Rebekah Goodheart of Commissioner Mignon Clyburn’s office, and met with Nicholas Degani of Commissioner Pai’s office to discuss the role of the members in the Lifeline program and the Notices of Apparent Liability (“NALs”) recently issued to several Lifeline eligible telecommunications carriers (“ETCs”) including three members of the Coalition – i-wireless, Telrite and Global Connection. Also on January 23, 2014, John Heitmann met with Christi Barnhart of Commissioner Rosenworcel’s office and on January 24, 2014 John Heitmann and Joshua Guyan met with Amy Bender of Commissioner O’Reilly’s office to discuss the same matters. The following summary captures points made during the discussions related to the above-captioned dockets.

Lifeline Connects Coalition Support of the Lifeline Program

We discussed the Coalition’s role in response to the Commission’s call for industry support in publically defending the program and promoting its effectiveness. These companies have developed and distributed materials to use in support of the program, including

¹ The members of the Coalition represented by the undersigned are Boomerang Wireless, LLC; Global Connection Inc. of America; i-wireless LLC; Telrite Corporation; and Blue Jay Wireless, LLC.

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the enclosed Myths v. Facts to dispel false rumors regarding the program;² summary of the Commission's Lifeline reforms to demonstrate the Commission's actions to reform and improve the Lifeline program;³ and testimonials from Lifeline subscribers to highlight the stories of real people that rely on these companies and the Lifeline program to provide access to employers, potential employers, teachers, doctors, nurses and family while they struggle to improve their economic situation.⁴ Further, these companies joined to form the Lifeline Reform 2.0 Coalition in June 2013 to file a petition for rulemaking proposing additional business-plan agnostic reforms to the Lifeline program.⁵ A summary of the Lifeline Reform 2.0 proposals is enclosed.⁶

Competition Will Improve the Transition to Broadband

These companies support the transition of the Lifeline program to support broadband service for low-income households and will be key to ensuring competition in the low-income and Lifeline markets to provide broadband service. The program does not benefit from having only one or two major wireless Lifeline providers. Rather, it is improved by the existence of competition in the marketplace, which has resulted in an increase in the standard free wireless minutes offering from 68 minutes to 250 minutes and improved text messaging offers. Further, some ETCs like Boomerang Wireless are already experimenting with offering some broadband data service to Lifeline subscribers on a trial basis. Broadband offerings for low-income Americans will be improved by having healthy competition in the wireless Lifeline marketplace.

Commitment to Combating Duplicate Enrollment Attempts

We also discussed the commitment these companies have made to combating duplicate enrollments in the Lifeline program, both within each company and between ETCs. For example, these companies have joined with dozens of other ETCs that voluntarily utilize an Inter-company Duplicates Database ("IDD") developed by CGM, LLC that currently includes more than 2.2 million lines and has prevented over 337,000 duplicate enrollment attempts since its inception. That equates to savings to the Lifeline program of \$3.9 million per month, which would be \$46.8 million annually.⁷ These efforts were undertaken before the development of the

² See Exhibit A.

³ See Exhibit B.

⁴ See Exhibit C.

⁵ See Lifeline Reform 2.0 Coalition Petition for Rulemaking, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (filed June 28, 2013).

⁶ See Exhibit D.

⁷ See graphic representation at Exhibit E.

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Commission's National Lifeline Accountability Database ("NLAD") and the IDD has blocked inter-company duplicate enrollment attempts while the NLAD was supposed to have been operational (since February 2013).⁸ These companies have worked extensively with the Wireline Competition Bureau ("Bureau") and the Universal Service Administrative Company ("USAC") to vet and improve the NLAD (including its identity verification component), including by flying in technical advisors from the companies to meet with and assist USAC and its NLAD vendor and through CGM's consistent efforts to educate the Bureau and USAC on its experience building and operating a duplicates database. The companies are pleased that the NLAD will be "live" for real-time enrollment "dips" starting next month and stand ready to help to make sure that the launch is successful.

The Notices of Apparent Liability

Unfortunately, despite these efforts to combat duplicate enrollments, the Commission has undertaken a misguided and harmful process of proposing multi-million dollar fines against ETCs for failing to eradicate 100 percent of end-user fraud allegedly perpetrated in the form of intra-company duplicate enrollments in the Lifeline program. The NALs give the false perception to the media, Congress and the American public that there has been over \$90 million in fraud committed in the Lifeline program, when in fact the alleged overpayments from the fund total approximately \$330,000.

i-wireless, Telrite, and Global Connection each have received an NAL, despite the fact that each company has had its compliance program and duplicate detection processes vetted and approved by the Bureau. Each company disputes the allegation of duplicate enrollments, but even if every one of the alleged intra-company duplicates were duplicates, the companies would have near-perfect track records at protecting the program from such duplicate enrollments – i-wireless 99.7 percent, Telrite 99.6 percent and Global Connection 99.4 percent. The Commission and USAC appear to expect perfection in guessing what USAC deems to be a duplicate, but these track records at blocking duplicate enrollment attempts are not the sign of ETCs that ignore the Commission's rules or abuse the program by accepting duplicate enrollments attempts by end-users. In fact, if each company were subject to the Improper Payments Elimination and Recovery Act of 2010 threshold for government disbursement programs, none would be considered to be susceptible to "significant improper payments" because the alleged improper payments are less than 1.5 percent.⁹

⁸ See graphic representation showing the timeline for the NLAD at Exhibit F.

⁹ See *Improper Payments Elimination and Recovery Act of 2010*, P.L. 111-204 (Jul. 22, 2010, 31 U.S.C. § 3321).

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Indeed, each company has extensive processes and procedures in place to block duplicate enrollments, both intra-company through internal database checks and inter-company through the IDD using software that looks for matching data. However, the Commission's rules and orders do not define a "duplicate" for purposes of the one-per-household rule, nor do they define a "subscriber" for purposes of determining whether the subscriber receives more than one Lifeline-supported service. Notably, when the Bureau has provided guidance on what it views to represent a duplicate, it has offered something different on no less than four occasions (In-Depth Validation instructions to USAC, Lifeline Biennial Audits, NLAD seeding and in Public Notices requiring the use of all subscriber data for detecting duplicates).¹⁰

In the IDVs that were conducted by USAC since 2011, the Commission instructed USAC to look for "same name and same address" duplicates.¹¹ Instead, USAC looked for similar name and similar address "duplicates" using a subjective process that it would not make available to ETCs. No Commission rule, however, defines which similarities are meaningful and which are not – or how to address multiple variations in that information. For example, USAC appears to discount or ignore differences in name such as Jr. and Sr. (regardless of whether the subscribers have completed an independent economic household form) and secondary address fields such as apartment numbers.

In 2013, USAC started notifying ETCs of alleged intra-company duplicates and instructing ETCs through findings letters to de-enroll them. Although the companies often suspected that many or all of the alleged duplicates were not in fact duplicates, they generally followed a practice of de-enrolling the subscribers within 5 business days at the instruction of USAC as they had done for inter-company duplicates. The findings generally involved a tiny portion (less than 1%) of the subscribers reviewed and small amounts ranging from \$9 to a few hundred or a few thousand dollars that USAC captured from the ETC's next month's disbursement. As a result of the release of the NALs discussed herein, ETCs, including those that have not received NALs like Boomerang Wireless, have begun appealing all USAC intra-company duplicate IDV findings to the Bureau.

In order to thwart duplicate enrollment attempts, since June 2012, the Commission has required Lifeline ETCs to obtain two additional pieces of information about each subscriber: date of birth and last four digits of the subscriber's social security number ("SSN"). The Bureau has addressed the question of what ETCs must do with this information

¹⁰ See *Wireline Competition Bureau Announces Duty to Query the National Lifeline Accountability Database*, WC Docket No. 11-42, Public Notice, DA 14-40 (rel. Jan. 14, 2014) ("NLAD Query Public Notice").

¹¹ See Letter from Sharon E. Gillett, Chief, WCB, to D. Scott Barash, Acting Chief Executive Officer, USAC, DA 11-1082 at 5 (June 21, 2011).

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differently in several different contexts. The NLAD will check applicants for same exact last name, date of birth and last four digits of the SSN, which will be effective, but no process can be perfect and perfection should not be expected. Further, the Bureau has proposed audit procedures for the Lifeline Biennial Audits that would require independent auditors to define a “subscriber” as having a match of (full) name, date of birth and last four digits of the SSN.¹² While USAC ignores date of birth and SSN information for purposes of finding duplicates in its IDVs, the Bureau (rationally) instructs ETCs that they must consider that information in making a duplicate determination.¹³

Starting in September 2013, likely in response to pressure from Congress, the Commission started converting the IDVs, in many cases, directly into NALs without any Letter of Inquiry from the Enforcement Bureau. The NALs impose an unconstitutional forfeiture structure that seeks to fine Telrite \$22,399,761 for alleged overpayments from the Lifeline program of \$41,587;¹⁴ to fine Global Connection \$11,702,695 for alleged overpayments of \$22,565;¹⁵ and to fine i-wireless \$8,753,074 for alleged overpayments of \$24,358.¹⁶ Those proposed fines are multiples of **538, 519 and 359 times** the alleged harm to the Lifeline program.¹⁷ In one particularly egregious example, the Commission has proposed to fine i-wireless \$25,027.75 for a single alleged duplicate subscriber in West Virginia.¹⁸

In previous enforcement actions alleging duplicate Lifeline accounts, the Commission proposed fines that were **3.6 times** (VCI Company),¹⁹ **1.09 times** (TerraCom)²⁰ and

¹² See *Wireline Competition Bureau Seeks Comment on the Lifeline Biennial Audit Plan*, WC Docket No. 11-42, Public Notice, DA 13-2016, at Attachment 2, p. 15 (rel. Sept. 30, 2013).

¹³ See NLAD Query Public Notice

¹⁴ *In re Telrite Corporation*, Notice of Apparent Liability for Forfeiture, File No. EB-IHD-13-00010674 (rel. Dec. 11, 2013) (“Telrite NAL”).

¹⁵ *In re Global Connection Inc. of America d/b/a Stand Up Wireless*, Notice of Apparent Liability for Forfeiture, File No. EB-IHD-13-00010970 (rel. Dec. 11, 2013) (“Global Connection NAL”).

¹⁶ *In re i-wireless, LLC*, Notice of Apparent Liability for Forfeiture, File No. EB-IHD-13-00010656 (rel. Nov. 1, 2013) (“i-wireless NAL”).

¹⁷ See graphic representations at Exhibit G.

¹⁸ See i-wireless NAL.

¹⁹ See *In the Matter of VCI Company Apparent Liability for Forfeiture*, File No. EB-07-IH-3985, Notice of Apparent Liability for Forfeiture and Order, 22 FCC Rcd 15933 (rel. Aug. 15, 2007).

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4.2 times (YourTel)²¹ the alleged overpayment. As a further comparison, in the Commission's recent consent decree with AT&T over improper Telecommunications Relay Service ("TRS") reimbursements, AT&T agreed to make an \$11,250,000 voluntary contribution in addition to a reimbursement of \$7,000,000 in improperly received TRS funds – a penalty representing **1.6 times** the alleged harm.²² In an action regarding alleged violations of the Commission's truth-in-billing rules against Verizon Wireless, the Commission proposed to fine the company **less than half** of the alleged overpayments received for data usage charges.²³ These comparisons demonstrate that the fines proposed against Telrite, Global Connection, i-wireless and other Lifeline ETCs are unlawfully punitive.

Fines like those proposed against Telrite, Global Connection, i-wireless and others threaten the viability of the Lifeline program and impact even those ETCs that have not received an NAL. Since no company can be perfect at eliminating all intra-company duplicates by guessing perfectly what USAC will determine to be a similar name, similar address "duplicate," under its subjective standard, all ETCs are operating with the prospect of such enforcement actions and the unreasonably punitive fines structure. The specter of these NALs has slowed or stopped state approval of ETC designations (even for ETCs without NALs), threatened investment in Lifeline providers and resulted in job losses at ETCs.

The NALs and IDV appeals have revealed that USAC's "similar name, similar address" approach to duplicate detection can result in outcomes that could be or could be perceived to be racial profiling or some other form of discrimination resulting in disparate impact or disparate treatment. For example, one i-wireless IDV that was included in its NAL alleges that two subscribers both named Jose with different last names, different SSNs and different dates of birth that live in the same apartment building in the Bronx, New York (in different apartments) are duplicates. As another example, Boomerang Wireless not only appealed the IDV findings but also appealed the disconnect and self-help aspects with respect to duplicate pairs for which it has an independent economic household form and for another group of

²⁰ See *In the Matter of TerraCom, Inc.*, Consent Decree, 28 FCC Rcd 1527 (rel. Feb. 26, 2013).

²¹ *In the Matter of YourTel America, Inc.*, Consent Decree, 28 FCC Rcd 1539 (rel. Feb. 26, 2013).

²² See *In the Matter of AT&T*, File No.: EB-TCD-12-00000337, Acct. No.: 201332170011, FRN: 0005193701, Order 28 FCC Rcd 5994, 6004-05 (rel. May 7, 2013).

²³ See *In the Matter of Verizon Wireless Data Usage Charges*, File No. EB-09-TC-458, Account No. 201132170001, FRN No. 0019212406, 25 FCC Rcd 15105 (rel. Oct. 28, 2010) (Verizon Wireless agreed to a voluntary contribution of \$25 million for \$52.8 million refunded to customers).

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duplicates that would result in Boomerang Wireless having to disconnect members of an Asian ethnic minority with short, similar names who live close by to each other.²⁴ We do not suggest that USAC would intentionally discriminate against certain ethnic minorities. However, the extent to which outcomes like this have resulted from USAC's unauthorized deviation from the Bureau's instructions for conducting IDVs²⁵ is not known. Fortunately, with the NLAD finally going "live" next month, the Commission can soon rely on a more predictable and rational means of duplicate detection that avoids the unintended consequences resulting from USAC's IDVs.

This letter is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

Counsel to Boomerang Wireless, LLC; Global Connection Inc.; i-wireless LLC; Telrite Corporation; and Blue Jay Wireless, LLC

Enclosures

cc: Rebekah Goodheart
Nicholas Degani
Christi Barnhart
Amy Bender

²⁴ See Notice of Written *Ex Parte* Presentation Regarding Boomerang Wireless Request for Review; WC Docket Nos. 11-42, 03-109 (filed Jan. 10, 2014); Boomerang Wireless, LLC Supplement to Request for Review, WC Docket Nos. 11-42, 03-109, (Jan. 10, 2014).

²⁵ See 47 C.F.R. § 54.702(c); *The Conference Group, LLC v. FCC*, 720 F.3d 957, 960 (D.C. Cir. 2013) (USAC "has no policy or interpretive role").

EXHIBIT A

LifeLineConnects

The Truth About Lifeline

Myth: The government gives away cellphones through Lifeline.

Fact: The Lifeline program does not pay for phones. It subsidizes the services only.

Myth: This is just another Obama Administration entitlement program.

Fact: The Lifeline program was created in 1985 under President Ronald Reagan for wireline phone service only. In 2005, Lifeline was expanded under the Bush Administration to include pre-paid wireless service.

Myth: Cellphone service is a luxury and does not require a government subsidy.

Fact: When the program began in 1985, only 80 percent of low-income households had phone service. Today, that level has increased to 92 percent in large part due to the success of the Lifeline program. According to the Centers for Disease Control, a majority of Americans living in poverty have only a cellphone and no wireline telephone, and over 40 percent of children live in homes with only a cellphone.

Myth: All you have to do is sign up. There's no real check to see who is eligible.

Fact: All Lifeline service providers are now required by the FCC to verify eligibility of a consumer by verifying income or participation in a qualifying program. A consumer is only eligible for Lifeline if their income is at or below 135 percent of the federal poverty guidelines, or a participant in Medicaid, Food Stamps, Federal Public Housing Assistance, National School Lunch Program, Bureau of Indian Affairs General Assistance, or Head Start.

Myth: Our tax dollars are used to pay for these discounted phone services.

Fact: Absolutely no federal tax dollars are used to fund the program. Funding comes from the Universal Service Fund (USF) from fees assessed on service providers and customers, which is also used to provide subsidies for rural phone service, rural telemedicine connectivity and public schools and libraries.

Myth: People can sign up for as many Lifeline accounts as they want.

Fact: The FCC's rules permit only one Lifeline account per household. The FCC and the industry have worked diligently to eliminate duplicate enrollments, and later this year,

the National Lifeline Accountability Database is expected to come online to help prevent duplicate enrollments before they happen.

Myth: The program ballooned and became fraught with fraud under the Obama Administration.

Fact: Under Chairman Genachowski, major reforms adopted last year to curb waste, fraud and abuse have saved the fund more than \$200 million in 2012 and are projected to save \$400 million in 2013. The fact is that under the FCC's recent reforms, enrollment in Lifeline has leveled off and has begun to shrink.

Myth: 41% of Lifeline subscribers couldn't demonstrate eligibility or refused to respond to requests for recertification in 2012.

Fact: The FCC found that [29% -- not 41% --](#) of Lifeline customers that were enrolled in the program as of June 2012 were de-enrolled at the conclusion of the 2012 Lifeline Recertification Process. The FCC concluded that a non-response to a recertification request does not indicate that a subscriber was ineligible at the time of enrollment or at the time of the annual recertification.

For more information on the Lifeline Program, visit <http://www.lifelineconnects.org/>

EXHIBIT B

Federal Communications Commission Low-Income Fund Reforms
Lifeline Reform Order (FCC 12-11) February 6, 2012
Lifeline Further Reform Order (DA 13-1441) June 25, 2013

- Conformed the Lifeline rules to the new definition of “voice telephony service”
- Provides blanket forbearance from the “own facilities” requirement, if carriers file a Compliance Plan
- Toll Limitation Service support to be phased down and then eliminated
- New flat \$9.25 Lifeline reimbursement
- Link Up eliminated, except in Tribal areas for ETCs receiving High Cost support
- New eligibility, enrollment, certification and verification regime, including duplicates and eligibility databases; requirement to view proof of eligibility
- The 2013 Lifeline Reform Order states that ETCs may not provide an activated device for Lifeline service until the consumer’s eligibility is fully verified and all enrollment steps are completed
- As of June 1, 2012, customer eligibility depends on compliance with one-per-household requirement
 - ETCs must inform prospective customers that only one Lifeline service is available per household (marketing disclosures)
 - Lifeline application must include certification from customer that household is not already receiving a Lifeline service
- Marketing disclosures
- Two special requirements for pre-paid providers
 - Activation: no Lifeline support until the subscriber activates the service by means specified by carrier, such as outbound call
 - Usage: no Lifeline support for subscribers that have not “used” the service for 60 days
- ETCs were required to re-certify all existing customers as of June 1, 2012 by the end of 2012 and report to the FCC and USAC on January 31, 2013 (Form 555); must re-certify all subscribers annually and report by Jan. 31 for the previous year
- New ETCs will be audited by USAC within 12 months of seeking Lifeline reimbursement (by activating a Study Area Code to provide Lifeline service)
- ETCs that draw \$5 million or more annually from the Low-Income Fund must hire an independent audit firm to perform audits every 2 years

Savings Reported by the FCC

- February 12, 2013 News Release: 2012 savings in Lifeline program more than \$214 million; expect at least an additional \$400 million in 2013

EXHIBIT C



REAL FAMILIES
REAL STORIES
REAL LIFELINE

lifelineconnects.org

JOBS



"I was in desperate need of a phone and on the job hunt fiercely. Well my first interview I gave the receptionist my phone number and although I didn't get the job I got another interview and they were able to call me because of my new phone thanks to StandUP."



-Lillian W.



"Without my phone I could not make the phone calls to inquire about employment. I just received a call about an hour ago from an employer to schedule me for an interview. Without this phone that would not have been possible."

- Edward B. (Chicago, IL)



"I got laid off from my job and have been looking for employment for the past 7 months. I need to have a phone where potential employers can contact me."

-Tara G., Kentucky



"I used to work in a beauty shop, but I couldn't afford the rent any longer so now I cut hair out of my apartment. My clients need a way to contact me to schedule appointments. I rely on my Lifeline phone so that they can reach me. If they call and I'm not available, they'll go somewhere else."

--Charlene P., Indiana



SAFETY



"My kids and I were home alone one day and a young man started banging and kicking at my door and windows. He was screaming, "Let me in now!" My kids were scared, crying and upset because he would not stop or go away. I called 911. The police arrived and chased him away. Having my Life Wireless cell phone gives me a sense of comfort and security because I know I will be able to use it to call for help if I need to in the future."

- Amber M. (Saginaw, MI)



I am a domestic violence survivor and I am starting my life over with my two children. I currently have two jobs and pay rent and childcare expenses myself. I feel this phone will help me a lot. Thank you.



-Gekiya M.



"This phone has saved my life. I am a single mother of three and going to college. Within 48 hours of receiving this phone, I was assaulted. Had I not received this phone I would have never been in the position call 911. There was no one around at the time to help me. I am very grateful for the person at the tent who helped me get this phone. I went back to the tent a few days after my assault and thanked the agent for saving my life."

- Maria R. (Chicago, IL)



"I am a recovering addict. Me getting this phone and Lifeline service is going to be a fresh start of a new real life. Having this new phone will be the 1st thing that I will use to start my new life. Thank you so much!"



- Jenifer T. (Oklahoma City, OK)

VETERANS



“I’m a young Army veteran and a single father. I joined the service when I was 19 as a way to provide for my family. I’ve served for 6 years including tours in South Korea, Japan, Germany and Afghanistan. I income-qualify for Lifeline service. Since returning home, I’ve settled in a remote area of Nevada. I find occasional work as a freelance mechanic, but am struggling to find full-time employment. I use my Lifeline phone on my resume when applying for jobs and as a way to keep in touch with my family members that live far away.”

-Brian S., Nevada



“I became homeless and am now living in a shelter My StandUP Wireless phone has helped me keep in touch with my family during a current time of personal crisis. It has helped them to know that I am in a safe place.

My StandUP phone has helped me keep doctor’s appointments at the local Veteran’s Association facility and it has helped me to have a phone to receive calls for future employment. Without the StandUP phone I’d have no way of communicating with anyone and therefore get out of this personal crisis.

Thank you for being there for me! ”

- Regina F.



FAMILY



Meet Aesha M. from Broken Arrow, Oklahoma. Aesha is a single mom of one with another child on the way. She was in need of a phone to get in contact with her doctors and family during her pregnancy. She was very thankful for our help and told me that having Lifeline service would help her out tremendously in this time of need.



"I have three young children and need to provide their schools with an emergency contact number in case they need to reach me. My Lifeline phone gives me peace of mind knowing that I can be reached if anything happens to one of them."

-Darnique J., Ohio



"I don't want to have to rely on this service, but for now anything that can help us save money is a lifesaver. We just moved to Cincinnati from Missouri to live with my Dad. I'm trying to find a job so that we can save some money to find a place of our own. My kids qualify for Medicaid, so I can use this phone to make their doctor's appointments."

--Stephanie F., Kentucky



"Thank you for connecting our residents to Life Wireless' cell phone program. It may seem like such a simple thing to be able to place and receive calls, but when you are homeless and desperately trying to stabilize your family's life, having access to a reliable phone service is essential. Thank you so much for partnering with us to support these women."

- Julianna Janssen, Ascension Place (Minneapolis, MN)

FAMILY



"I am a single Mom with three kids. My ex-husband does not pay child support and I am solely responsible for taking care of our children. I clean houses and offices to make a living, but I need to know where my kids are and that they are okay when I'm working."

-Samantha L., Ohio

access **WIRELESS**

SENIORS



"I am 77 years old. I am so thankful for this phone and Lifeline services because it will give my family peace of mind. I have had 7 heart attacks and have seven stints. Needless to say my family is concerned about me. I am glad to have this phone because my family can now have peace of mind knowing that they can get in contact with me and that I have a way to call in case of an emergency. Lifeline service means peace of mind to my family and I."

Edwina Neadeau



"I became a StandUp customer in February of 2013. I am delighted with the service. My two grandsons have asthma. More than once the pre-K or elementary school has called me on my StandUp phone to alert me that the asthma was acting up so I could take them home to their machine that provides breathing treatments. That would not have been possible in the year before receiving my Lifeline phone as I did not have phone service."

-Susan B.



"I use my lifeline to make doctor appointments and to help with my 78 year old grandmother who suffers from arthritis. She fell just the other day and she was able to call me on my phone so that I could come over and help her get back up."

- Shandia S. (Saginaw, MI)